

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

(01) KAMEL MAHGUB ELBURKI,  
[DOB: 02/22/1988],

(02) TAYLER CHARLES JONES,  
[DOB: 01/23/1994],

(03) ASHLEY BROOKE CLEVENGER,  
[DOB: 09/06/1982],

(04) DECEASED DEFENDANT REMOVED

(05) RACHEL GALE SIMPSON,  
[DOB: 07/07/1983],

(06) CORY MATTHEW JOBE,  
[DOB: 04/24/1992],

(07) JUSTIN REN'E RAMIREZ,  
[DOB: 06/24/1996],

(08) DANIEL JESSIE RUIZ,  
[DOB: 10/28/1984],

(09) ASHLEY ANNE FRIES,  
[DOB: 12/17/1996],

(10) MATTHEW JOHN FABULAE,  
[DOB: 1/24/1989],

(11) RICHARD DEAN SAETTONE, II  
[DOB: 11/03/1980],

(12) MARY RUTH CRAFT  
[DOB: 10/10/1977],

(13) JAMES RUSSELL SCHROEDER  
[DOB: 12/07/1972],

**Case No. 19-00406-01/19-W-CR-RK**

**COUNT ONE:** All Defendants  
*(Conspiracy Distribute Methamphetamine and Heroin)*

21 U.S.C. §§ 841(a)(1), (b)(1)(A) & 846

NLT: 10 Years Imprisonment

NMT: Life Imprisonment

NMT: \$10,000,000 Fine

NLT: 5 Years Supervised Release

Class A Felony

**COUNT TWO:** All Defendants  
*(Conspiracy to Commit Money Laundering)*

18 U.S.C. §§ 1956(a)(1)(A)(i), (B)(i), (ii), & (h)

NMT: Twenty Years Imprisonment

NMT: \$500,000 Fine

NMT: Three Years Supervised Release

Class C Felony

**COUNTS THREE thru THIRTEEN:**

Defendants Elburki, Jones, Jobe, Ramirez,

Ruiz, Fries, Fabulae, Saettone, Craft,

Turbyfill, Nieman, and Smith only

*(Possess Firearms with Drug Trafficking)*

18 U.S.C. § 924(c)(1)(A)(i), (ii), (iii) and 2

NLT: 5 Years and NMT Life Imprisonment

NLT: 7 Years and NMT Life Imprisonment

NLT: 10 Years and NMT Life Imprisonment

NMT: \$250,000 Fine

NMT: 5 Years Supervised Release

Class A Felony

**COUNTS FOURTEEN – TWENTY-ONE:**

Defendants Elburki, Jones, Jobe, Fries,

Fabulae, Saettone, Craft, Turbyfill, and

Nieman, only

*(Felon Possess Firearm and Ammunition)*

18 U.S.C. §§ 922(g)(1), 924(a)(2) and 2

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

(14) MICHAEL PAUL LAMBERT  
[DOB: 01/01/1977],

(15) SETH ALAN TURBYFILL  
[DOB: 11/21/1988],

(16) AMY LEANN NIEMAN, a/k/a “Amy  
Leann Simpson” “Amy Leann Matthews”  
[DOB: 09/09/1971],

(17) IAN LEE COOK  
[DOB: 03/12/1993],

(18) MEGAN ELIZABETH (LAWSON)  
JACKSON  
[DOB: 05/04/1993],

(19) BRIAN DOUGLAS SMITH  
[DOB: 10/10/1977]

Defendants.

**COUNTS TWENTY-TWO thru  
TWENTY-FOUR:** Defendants Ramirez,  
Ruiz, and Fabulae, only  
***(Drug User in Possession of Firearms and  
Ammunition)***

18 U.S.C. §§ 922(g)(3) and 924(a)(2)  
NMT 10 Years Imprisonment  
NMT \$250,000 Fine  
NMT 3 Years Supervised Release  
Class C Felony

**COUNT TWENTY-FIVE:** Defendants  
Elburki, Jones, Simpson, Jobe, Ramirez,  
Ruiz, Fabulae, Saettone, Craft, Schroeder,  
Lambert, and Jackson, only  
***(Possession with intent to distribute  
methamphetamine and heroin)***

21 U.S.C. §§ 841(a)(1), (b)(1)(A)  
NLT: 10 Years Imprisonment  
NMT: Life Imprisonment  
NMT: \$10,000,000 Fine  
NLT: 5 Years Supervised Release  
Class A Felony

**ALLEGATION OF CRIMINAL  
FORFEITURE:** **All Defendants**  
21 U.S.C. § 853

\$100 Mandatory Special Assessment for each  
count of conviction

**SUPERSEDING INDICTMENT**

<b>(1) KAMEL MAHGUB ELBURKI</b>	<b>1, 2, 3, 14 and 25</b>
<b>(2) TAYLER CHARLES JONES</b>	<b>1, 2, 4, 15 and 25</b>
<b>(3) ASHLEY BROOKE CLEVINGER</b>	<b>1 and 2</b>
<b>(5) RACHEL GALE SIMPSON</b>	<b>1, 2 and 25</b>
<b>(6) CORY MATTHW JOBE</b>	<b>1, 2, 5, 16 and 25</b>
<b>(7) JUSTIN REN'E RAMIREZ</b>	<b>1, 2, 6, 22 and 25</b>

<b>(8) DANIEL JESSIE RUIZ</b>	<b>1, 2, 7, 23 and 25</b>
<b>(9) ASHLEY ANNE FRIES</b>	<b>1, 2, 8 and 17</b>
<b>(10) MATTHEW JOHN FABULAE</b>	<b>1, 2, 9, 18, 24 and 25</b>
<b>(11) RICHARD DEAN SAETTONE, II</b>	<b>1, 2, 10, 19, and 25</b>
<b>(12) MARY RUTH CRAFT</b>	<b>1, 2, 11, 20 and 25</b>
<b>(13) JAMES RUSSELL SCHROEDER</b>	<b>1, 2 and 25</b>
<b>(14) MICHAEL PAUL LAMBERT</b>	<b>1, 2 and 25</b>
<b>(15) SETH ALAN TURBYFILL</b>	<b>1, 2, 12 and 21</b>
<b>(16) AMY LEANN NIEMAN, a/k/ “Amy Leann Simpson” “Amy Leann Matthews”</b>	<b>1, 2, 12 and 21</b>
<b>(17) IAN LEE COOK</b>	<b>1, 2</b>
<b>(18) MEGAN ELIZABETH (LAWSON) JACKSON</b>	<b>1, 2 and 25</b>
<b>(19) BRIAN DOUGLAS SMITH</b>	<b>1, 2, and 13</b>

THE GRAND JURY CHARGES THAT:

**COUNT ONE – all Defendants**

***(Conspiracy to Distribute 500 Grams of Methamphetamine and One kilogram of Heroin)***

Between on or about January 1, 2017, and September 30, 2020, the exact dates unknown to the Grand Jury, within the Western District of Missouri and other places, KAMEL MAHGUB ELBURKI, TAYLER CHARLES JONES, ASHLEY BROOKE CLEVINGER, RACHEL GALE SIMPSON, CORY MATTHEW JOBE, JUSTIN REN’E RAMIREZ, DANIEL JESSIE RUIZ, ASHLEY ANNE FRIES, MATTHEW JOHN FABULAE, RICHARD DEAN SAETTONE, II, MARY RUTH CRAFT, JAMES RUSSELL SCHROEDER, MICHAEL PAUL LAMBERT, SETH ALAN TURBYFILL, AMY LEANN NIEMAN, a/k/a “Amy Leann Simpson” “Amy Leann Matthews,” IAN LEE COOK, MEGAN ELIZABETH (LAWSON) JACKSON, and BRIAN

DOUGLAS SMITH, defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and others, both known and unknown to the Grand Jury, to distribute five-hundred (500) grams and more of methamphetamine, a Schedule II controlled substance, and one kilo and more of heroin, a Schedule I controlled substance, all contrary to the provisions of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and 846.

**COUNT TWO – all Defendants**  
***(Conspiracy to commit Money Laundering)***

Between on or about January 1, 2017, and September 30, 2020, the exact dates unknown to the Grand Jury, within the Western District of Missouri and other places, KAMEL MAHGUB ELBURKI, TAYLER CHARLES JONES, ASHLEY BROOKE CLEVINGER, EDWARD JASON ALBERTY, JR., RACHEL GALE SIMPSON, CORY MATTHEW JOBE, JUSTIN REN'E RAMIREZ, DANIEL JESSIE RUIZ, ASHLEY ANNE FRIES, MATTHEW JOHN FABULAE, RICHARD DEAN SAETTONE, II, MARY RUTH CRAFT, JAMES RUSSELL SCHROEDER, MICHAEL PAUL LAMBERT, SETH ALAN TURBYFILL, AMY LEANN NIEMAN, a/k/a "Amy Leann Simpson" "Amy Leann Matthews," IAN LEE COOK, MEGAN ELIZABETH (LAWSON) JACKSON, and BRIAN DOUGLAS SMITH, defendants herein, and others, both known and unknown to the Grand Jury, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, did knowingly and intentionally combine, conspire, confederate and agree with each other and others, both known and unknown to the Grand Jury, to conduct financial transactions which in fact involved the proceeds of a specified unlawful activity, to wit: conspiracy to distribute controlled substances and possession with intent to distribute controlled substances, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 846, as charged in **Counts One** and **Twenty-Five** of

this indictment, with the intent to promote the carrying on of that specified unlawful activity, to wit: items of value, including cash, obtained from illegal controlled substance sales (*i.e.* “proceeds”) were used in whole or part to purchase additional controlled substances for sale, thus promoting the charged conspiracy and other drug activity, and additionally, knowing the transactions were designed to conceal the nature, source, location, ownership, and control of the said proceeds and to avoid reporting requirements, in that cash, obtained from controlled substance sales (*i.e.*, “proceeds”), was then deposited, in whole or part, into various financial institution accounts or stored, used, transmitted, or transported in such a manner as to conceal its true nature, source, location ownership, and control, and to avoid bank reporting requirements, all thus concealing the proceeds from the drug conspiracy and other drug activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), (B)(i), (ii) and (h).

The object of the conspiracy was to use drug sale proceeds to promote the drug trafficking charges in **Counts One** and **Twenty-Five**, and to conceal drug sale proceeds of that drug trafficking conspiracy and other drug activity.

The manner and means by which the conspiracy was sought to be accomplished included, among others, the following:

1. It was part of the conspiracy that its members would and did buy and sell illicit drugs.
2. It was further a part of the conspiracy that its members would and did obtain proceeds, in different ways or forms, from said buying and selling of illicit drugs.

3. It was further a part of the conspiracy that its members would and did treat the said proceeds in such a manner as to conceal the nature, source, location, ownership, and control of said proceeds and to avoid reporting requirements of said proceeds.

4. It was further a part of the conspiracy that its members would and did promote the conspiracy and other drug activity by exchanging items of value they obtained in a variety of manners for drugs to use and sale.

5. It was further a part of the conspiracy that its members would and did promote the conspiracy and other drug activity by obtaining additional illicit drugs for distribution with said proceeds.

6. It was further part of the conspiracy that its members would and did obtain assets with cash drug proceeds and did not identify the cash as drug proceeds.

7. It was further a part of the conspiracy that its members would and did deposit or transmit cash drug proceeds in and with various financial institutions and money transmitting businesses and not identify them as drug proceeds.

In furtherance of the conspiracy and to affect the objects of the conspiracy, the following overt acts, among others, were committed in the Western District of Missouri and elsewhere:

1. During the conspiracy period, conspirators both charged and uncharged, paid cash for controlled substances, thereby obscuring the drug trafficking conspiracy.

2. During the conspiracy period, conspirators packaged, transported, stored and used said proceeds without revealing their true source and in a manner as to conceal that true source.

3. During the conspiracy period, conspirators operated with coded terms and maintained coded records of drug amounts sold and cash proceeds collected or owed for drugs, thereby obscuring the nature and source of the cash.

4. During the conspiracy period, conspirators used cash proceeds from drug sales to fund other activities such as real property purchases, personal property purchases, travel, and living expenses, thereby obscuring the nature, source, or ownership of the cash.

5. During the conspiracy period, cash from drug sale proceeds was deposited, transmitted, or stored in such a manner so as to not reveal its source, location, or ownership and to avoid reporting requirements.

6. During the conspiracy, on multiple occasions, conspirators took cash obtained from drug sales and used those drug sale proceeds to purchase additional controlled substances.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), (B)(i), (ii) and (h).

**COUNT THREE**  
**Defendant Elburki only**  
***(Possess, Carry, Use, Firearm with Drug Trafficking)***

On or about between January 1, 2017, and December 12, 2019, within the Western District of Missouri, and other places, but all related to drug trafficking crimes within the Western District of Missouri, the defendant, KAMEL MAHGUB ELBURKI, in furtherance of and during and in relation to drug trafficking crimes for which he may be prosecuted, as set out in this indictment and otherwise, did knowingly and intentionally carry, possess, use, brandish, and discharge firearms, to-wit: a loaded Glock 27, .40 caliber semi-automatic handgun, serial number CVS588 and a loaded Taurus G2c, 9 mm semi-automatic handgun, serial number TLU21988, all contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii).

**COUNT FOUR**  
**Defendant Jones only**  
***(Possess, Carry, Use, Firearm with Drug Trafficking)***

On or about between January 1, 2017, and December 12, 2019, within the Western District of Missouri, and other places, but all related to drug trafficking crimes within the Western District of Missouri, the defendant, TAYLER CHARLES JONES, in furtherance of and during and in relation to drug trafficking crimes for which he may be prosecuted, as set out in this indictment and otherwise, did knowingly and intentionally carry, possess, use, brandish, and discharge firearms, to-wit: a loaded Glock model 30S, .45 caliber semi-automatic handgun, serial number BGBZ764, and various other firearms, all contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii).

**COUNT FIVE**  
**Defendant Jobe only**  
***(Possess, Carry, Use, Firearm with Drug Trafficking)***

On or about between January 1, 2017, and December 12, 2019, within the Western District of Missouri, and other places, but all related to drug trafficking crimes within the Western District of Missouri, the defendant, CORY MATTHEW JOBE, in furtherance of and during and in relation to drug trafficking crimes for which he may be prosecuted, as set out in this indictment and otherwise, did knowingly and intentionally carry, possess, use, brandish, and discharge firearms, to-wit: a loaded Taurus .38 caliber revolver, serial number JU45385, all contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii).

**COUNT SIX**  
**Defendant Ramirez only**  
***(Possess, Carry, Use, Firearm with Drug Trafficking)***

On or about between January 1, 2017, and December 12, 2019, within the Western District of Missouri, and other places, but all related to drug trafficking crimes within the Western District

of Missouri, the defendant, JUSTIN REN'E RAMIREZ, in furtherance of and during and in relation to drug trafficking crimes for which he may be prosecuted, as set out in this indictment and otherwise, did knowingly and intentionally carry, possess, use, brandish, and discharge firearms, to-wit: a loaded Glock 27, .40 caliber semi-automatic handgun, serial number CVS588 and a loaded Taurus G2c, 9 mm semi-automatic handgun, serial number TLU21988, all contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii).

**COUNT SEVEN**

*Defendant Ruiz only*

***(Possess, Carry, Use, Firearm with Drug Trafficking)***

On or about between January 1, 2017, and December 12, 2019, within the Western District of Missouri, and other places, but all related to drug trafficking crimes within the Western District of Missouri, the defendant, DANIEL JESSIE RUIZ, in furtherance of and during and in relation to drug trafficking crimes for which he may be prosecuted, as set out in this indictment and otherwise, did knowingly and intentionally carry, possess, use, brandish, and discharge firearms, to-wit: more than sixty rifles, shotguns, semi-automatic handguns, and other firearms, explosives, ammunition, and weapons, seized from his residence February 22, 2019, October 23, 2019, and December 2, 2019, all contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii).

**COUNT EIGHT**

*Defendant Fries only*

***(Possess, Carry, Use, Firearm with Drug Trafficking)***

On or about between January 1, 2017, and December 12, 2019, within the Western District of Missouri, and other places, but all related to crimes of violence and drug trafficking crimes within the Western District of Missouri, the defendant, ASHLEY ANNE FRIES in furtherance of and during and in relation to crimes of violence and drug trafficking crimes for which she may be

prosecuted, as set out in this indictment and otherwise, did knowingly and intentionally carry, possess, use, brandish, and discharge firearms, to-wit: a Glock Model 23, .40 caliber semi-automatic handgun, serial number ACNG048, all contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii).

**COUNT NINE**

*Defendant Fabulae only*

***(Possess, Carry, Use, Firearm with Drug Trafficking)***

On or about between January 1, 2017, and December 12, 2019, within the Western District of Missouri, and other places, but all related to crimes of violence and drug trafficking crimes within the Western District of Missouri, the defendant, MATTHEW JOHN FABULAE, in furtherance of and during and in relation to crimes of violence and drug trafficking crimes for which he may be prosecuted, as set out in this indictment and otherwise, did knowingly and intentionally carry, possess, use, brandish, and discharge firearms, to-wit: a loaded Imperial .22 caliber revolver, serial number 29025, an American Tactical Imports AR-15, .223 caliber, semi-automatic handgun, loaded with 30 rounds, serial number NS159813, a loaded Smith and Wesson MP-40, semi-automatic handgun, serial number HWM9784, all contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii).

**COUNT TEN**

*Defendant Saettone only*

***(Possess, Carry, Use, Firearm with Drug Trafficking)***

On or about between January 1, 2017, and December 12, 2019, within the Western District of Missouri, and other places, but all related to drug trafficking crimes within the Western District of Missouri, the defendant, RICHARD DEAN SAETTONE, II, in furtherance of and during and in relation to drug trafficking crimes for which he may be prosecuted, as set out in this indictment and otherwise, did knowingly and intentionally carry, possess, use, brandish, and discharge

firearms, to-wit: a loaded SCCY CPX-2, 9 mm semi-automatic handgun, serial number 147965, all contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii).

**COUNT ELEVEN**  
**Defendant Craft only**  
***(Possess, Carry, Use, Firearm with Drug Trafficking)***

On or about between January 1, 2017, and September 30, 2020, within the Western District of Missouri, and other places, but all related to drug trafficking crimes within the Western District of Missouri, the defendant, MARY RUTH CRAFT, in furtherance of and during and in relation to drug trafficking crimes for which he may be prosecuted, as set out in this indictment and otherwise, did knowingly and intentionally carry, possess, use, brandish, and discharge firearms, to-wit: a stolen Lamberta Glock Model 43, 9 mm semi-automatic pistol, serial number ADEL214, and a Cobra, Model CB9, 9 mm derringer, serial number CT230574, all contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii).

**COUNT TWELVE**  
**Defendants Turbyfill and Nieman, only**  
***(Possess, Carry, Use, Firearm with Drug Trafficking)***

On or about between January 1, 2017, and September 30, 2020, within the Western District of Missouri, and other places, but all related to drug trafficking crimes within the Western District of Missouri, the defendants, SETH ALAN TURBYFILL and AMY LEANN NIEMAN, a/k/a “Amy Leann Simpson” “Amy Leann Matthews,” aiding and abetting each other, in furtherance of and during and in relation to drug trafficking crimes for which he may be prosecuted, as set out in this indictment and otherwise, did knowingly and intentionally carry, possess, use, brandish, and discharge firearms, to-wit: a Ruger EC9 9 mm semi-automatic handgun bearing serial number

45639231, contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), (iii) and 2.

**COUNT THIRTEEN**  
**Defendant Smith only**  
***(Possess, Carry, Use, Firearm with Drug Trafficking)***

On or about between January 1, 2017, and September 30, 2020, within the Western District of Missouri, and other places, but all related to drug trafficking crimes within the Western District of Missouri, the defendant, BRIAN DOUGLAS SMITH, in furtherance of and during and in relation to drug trafficking crimes for which he may be prosecuted, as set out in this indictment and otherwise, did knowingly and intentionally carry, possess, use, brandish, and discharge firearms, to-wit: various firearms associated with SMITH as recorded on various media that was recovered by law enforcement during the investigation and as further described in discovery, contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), (iii) and 2.

**COUNT FOURTEEN**  
**Defendant Elburki only**  
***(Felon in Possession of a Firearm and Ammunition)***

On or about between January 1, 2017, and December 12, 2019, within the Western District of Missouri, KAMEL MAHGUB ELBURKI, defendant, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm and ammunition, to wit: a loaded Glock 27, .40 caliber semi-automatic handgun, serial number CVS588 and a loaded Taurus G2c, 9 mm semi-automatic handgun, serial number TLU21988, and various ammunition, all which had been transported in interstate commerce, all contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT FIFTEEN**  
**Defendant Jones only**  
***(Felon in Possession of a Firearm and Ammunition)***

On or about between January 1, 2017, and December 12, 2019, within the Western District of Missouri, TAYLER CHARLES JONES, defendant, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm and ammunition, to wit: a loaded Glock model 30S, .45 caliber semi-automatic handgun, serial number BGBZ764, and various other firearms and ammunition, all which had been transported in interstate commerce, all contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT SIXTEEN**  
**Defendant Jobe only**  
***(Felon in Possession of a Firearm and Ammunition)***

On or about between January 1, 2017, and December 12, 2019, within the Western District of Missouri, CORY MATTHEW JOBE, defendant, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm and ammunition, to wit: a loaded Taurus .38 caliber revolver, serial number JU45385, and various ammunition, all which had been transported in interstate commerce, all contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT SEVENTEEN**  
**Defendant Fries only**  
***(Felon in Possession of a Firearm and Ammunition)***

On or about between January 1, 2017, and December 12, 2019, within the Western District of Missouri, ASHLEY ANNE FRIES, defendant, knowing she had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and

affecting interstate commerce, a firearm and ammunition, to wit: a Glock Model 23, .40 caliber semi-automatic handgun, serial number ACNG048, and various ammunition, all which had been transported in interstate commerce, all contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT EIGHTEEN**  
**Defendant Fabulae only**  
***(Felon in Possession of a Firearm and Ammunition)***

On or about between January 1, 2017, and December 12, 2019, within the Western District of Missouri, MATTHEW JOHN FABULAE, defendant, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm and ammunition, to wit: a loaded Imperial .22 caliber revolver, serial number 29025, an American Tactical Imports AR-15, .223 caliber, semi-automatic handgun, loaded with 30 rounds, serial number NS159813, a loaded Smith and Wesson MP-40, semi-automatic handgun, serial number HWM9784, and various ammunition, all which had been transported in interstate commerce, all contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT NINETEEN**  
**Defendant Saettone only**  
***(Felon in Possession of a Firearm and Ammunition)***

On or about between January 1, 2017, and December 12, 2019, within the Western District of Missouri, RICHARD DEAN SAETTONE, II, defendant, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm and ammunition, to wit: a loaded SCCY CPX-2, 9 mm semi-automatic handgun, serial number 147965, and various ammunition, all which had been

transported in interstate commerce, all contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT TWENTY**  
**Defendant Craft only**  
***(Felon in Possession of a Firearm and Ammunition)***

On or about between January 1, 2017, and September 30, 2020, within the Western District of Missouri, MARY RUTH CRAFT, defendant, knowing she had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, firearms and ammunition, to wit: a stolen Lamberta Glock Model 43, 9 mm semi-automatic pistol, serial number ADEL214, and a Cobra, Model CB9, 9 mm derringer, serial number CT230574, and various ammunition, all which had been transported in interstate commerce, all contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT TWENTY-ONE**  
**Defendants Turbyfill and Neiman, only**  
***(Felon in Possession of a Firearm and Ammunition)***

On or about between January 1, 2017, and September 30, 2020, within the Western District of Missouri, SETH ALAN TURBYFILL and AMY LEANN NIEMAN, a/k/a “Amy Leann Simpson” “Amy Leann Matthews,” defendants, aiding and abetting each other, and knowing they had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm and ammunition, to wit: a Ruger EC9 9 mm semi-automatic handgun bearing serial number 45639231, and various ammunition, all which had been transported in interstate commerce, all contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2) and 2.

**COUNT TWENTY-TWO**  
**Defendant Ramirez only**  
***(Drug User in Possession of Firearms and Ammunition)***

On or about between January 1, 2017, and December 12, 2019, in the Western District of Missouri, and other places, the defendants, JUSTIN REN'E RAMIREZ, knowing he was an unlawful user of and addicted to controlled substances as defined in Title 21, United States Code, Section 802, including methamphetamine, heroin, cocaine, and marijuana, did knowingly possess, in and affecting commerce, firearms and ammunition, to wit: a loaded Glock 27, .40 caliber semi-automatic handgun, serial number CVS588 and a loaded Taurus G2c, 9 mm semi-automatic handgun, serial number TLU21988, and various ammunition, all which had been transported in interstate commerce and all in violation of Title 18, United State Code, Sections 922(g)(3) and 924(a)(2).

**COUNT TWENTY-THREE**  
**Defendant Ruiz only**  
***(Drug User in Possession of Firearms and Ammunition)***

On or about between January 1, 2017, and December 12, 2019, in the Western District of Missouri, and other places, the defendant, DANIEL JESSIE RUIZ, knowing he was an unlawful user of and addicted to controlled substances as defined in Title 21, United States Code, Section 802, including methamphetamine, heroin, cocaine, and marijuana, did knowingly possess, in and affecting commerce, firearms and ammunition, to wit: more than sixty rifles, shotguns, semi-automatic handguns, and other firearms, explosives, ammunition, and weapons, seized from his residence February 22, 2019, October 23, 2019, and December 2, 2019, all which had been transported in interstate commerce and all in violation of Title 18, United State Code, Sections 922(g)(3) and 924(a)(2).

**COUNT TWENTY-FOUR**

**Defendant Fabulae only**

***(Drug User in Possession of Firearms and Ammunition)***

On or about between January 1, 2017, and December 12, 2019, in the Western District of Missouri, and other places, the defendant, MATTHEW JOHN FABULAE, knowing he was an unlawful user of and addicted to controlled substances as defined in Title 21, United States Code, Section 802, including methamphetamine, heroin, cocaine, and marijuana, did knowingly possess, in and affecting commerce, firearms and ammunition, to wit: a loaded Imperial .22 caliber revolver, serial number 29025, an American Tactical Imports AR-15, .223 caliber, semi-automatic handgun, loaded with 30 rounds, serial number NS159813, a loaded Smith and Wesson MP-40, semi-automatic handgun, serial number HWM9784, and various ammunition, all which had been transported in interstate commerce and all in violation of Title 18, United State Code, Sections 922(g)(3) and 924(a)(2).

**COUNT TWENTY-FIVE**

**Defendants ElBurki, Jones, Simpson, Jobe, Ramirez, Ruiz, Fabulae, Saettone, Craft, Schroeder, Lambert, and Jackson, only**

***(Possession with intent to distribute 500 Grams of methamphetamine and one kilo of heroin)***

Between on or about January 1, 2017, and September 30, 2020, within the Western District of Missouri and other places, KAMEL MAHGUB ELBURKI, TAYLER CHARLES JONES, RACHEL GALE SIMPSON, CORY MATTHEW JOBE, JUSTIN REN'E RAMIREZ, DANIEL JESSIE RUIZ, MATTHEW JOHN FABULAE, RICHARD DEAN SAETTONE, II, MARY RUTH CRAFT, JAMES RUSSELL SCHROEDER, MICHAEL PAUL LAMBERT, and MEGAN ELIZABETH (LAWSON) JACKSON, defendants herein, did knowingly and intentionally possess with the intent to distribute five-hundred (500) grams and more of methamphetamine, a Schedule II controlled substance, and one kilogram and more of heroin, a

Schedule I controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A).

### **ALLEGATIONS OF FORFEITURE**

The allegations contained in **Counts One and Two** of this indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture, respectively, pursuant to the provisions of Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982(a)(1).

Upon conviction of **Count One**, each defendant named herein shall forfeit to the United States all property, real and personal, constituting or derived from any proceeds the defendant obtained directly and indirectly as a result of the violation incorporated by reference in this Allegation of Forfeiture and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violation incorporated by reference in this allegation, including, but not limited to, a **money judgment of approximately \$1,745,000.00** in United States currency, and any interest and proceeds traceable thereto, in that at least this sum, in aggregate, was received in exchange for, or is traceable thereto, the unlawful distribution of more than 150 kilograms (5300 ounces) of methamphetamine, based on an average street price of \$250.00 per ounce and the unlawful distribution of more than 10 kilos of heroin (353 ounces), based on an average street price of \$1,200.00 an ounce. Upon conviction of **Count Two**, each defendant shall forfeit to the United States any property, real or personal, involved in such offense or any property traceable to such property, including, but not limited to, a **money judgment of approximately \$1,745,000.00** in United States currency, and any interest and proceeds traceable thereto, in that at least this sum, in aggregate, was involved in the money laundering conspiracy.

### **FIREARMS**

Any firearms recovered during the investigation of this case, including, but not limited to, those specifically listed in **Counts Three thru Twenty-four** above, as they were all used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violations incorporated by reference in this allegation.

### **SUBSTITUTE ASSETS**

If any of the above-described forfeitable property of the above-named defendants, as a result of any act or omission of the defendants –

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above-described forfeitable property.

All in violation of Title 21, United States Code, Section 853, and pursuant to Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL.

9/30/2020  
DATE

/s/ Sean Saunders  
FOREPERSON OF THE GRAND JURY

/s/ Bruce Rhoades  
Bruce Rhoades  
Assistant United States Attorney  
Western District of Missouri